Mr. J. Mark Erler
Erler Industries, Inc.
P.O. Box 219
North Vernon, IN 47265

Re: **079-11173**
Second Administrative Amendment to
Part 70 079-7572-00010

Dear Mr. Erler:

Erler Industries, Inc. was issued a permit on September 23, 1998 for an operation which spray paints plastic and metal parts. A letter requesting a significant source modification was received on May 27, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary operation which spray paints plastic and metal parts.

Responsible Official:	J. Mark Erler
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address:	PO Box 219, North Vernon, Indiana 47265
SIC Code:	3479, **3663**
County Location:	Jennings
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts consists of the following emission units and pollution control devices:

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

(1) One (1) paint line, identified as Line 1, with three (3) manual paint booths, identified as EU1, EU2, and EU3 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V1, S/V2 and S/V3.

(2) One (1) paint line, identified as Line 2, with two (2) manual paint booths, identified as EU4 and EU5 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V4 and S/V5.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

Located in Plant 2 (71 Hayden Pike, North Vernon, Indiana 47265):

(1) One (1) paint line, identified as Line A, with three (3) manual paint booths, identified as EU6, EU7 and EU8, respectively, with a maximum of two (2) HVLP guns per booth, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V6, S/V7, and S/V8.

(2) One (1) paint line, identified as Line B, with four (4) paint booths (each booth using HVLP guns, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V9, S/V10, S/V11, and S/V12): two (2) manual booths, identified as EU9 and EU10, and two (2) robot paint booths, identified as EU11 and EU12.

Line A and Line B each have a maximum capacity of 4.0 gallons/hour of conductive copper paint, a maximum capacity of 2.5 gallons/hour of conductive silver paint and a maximum capacity of 2.0 gallons/hour with conductive black paint.

Located in Plant 3 (418 Stockwell Street, North Vernon, Indiana 47625)

(1) One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts that also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A, and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 mmBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

(b) Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

(c) Two (2) natural gas fired ovens located in Plant 3, identified as Oven-1 and Oven-2, exhausting to S/V3-1 and S/V3-2 respectively, rated at 1.2 mmBtu/hr, each.

(d) One (1) air make-up unit, located in Plant 3, identified as AM-1, rated at 6.0 mmBtu/hr.

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOC's is limited to ~~228~~ **less than 250** tons per ~~365 consecutive day~~ **twelve (12) consecutive month** period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

SECTION D.3 FACILITY OPERATION CONDITIONS INSIGNIFICANT ACTIVITIES

Facility Description [326 IAC 2-7-5(15)]

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 mmBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

(b) Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

(c) Two (2) natural gas fired ovens located in Plant 3, identified as Oven-1 and Oven-2, exhausting to S/V3-1 and S/V3-2 respectively, rated at 1.2 mmBtu/hr, each.

(d) One (1) air make-up unit, located in Plant 3, identified as AM-1, rated at 6.0 mmBtu/hr.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the two (2) 100,000 Btu/hr natural gas fired ovens, identified as 6A and 7A, and the two (2) IR ovens, identified as 9A and 10A, located in Plant 1, and those facilities listed in Condition D.1.4, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

The PM from the two (2) 1.0 mmBtu/hr ovens, identified as 8B and 9B, located in Plant 2, and those facilities listed in Condition D.2.3, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

The PM from the two (2) 1.2 mmBtu/hr ovens, identified as Oven-1 and Oven-2, located in Plant 3, and those facilities listed in Condition D.4.2, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Plant 3, Line 3

Located in Plant 3

One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

The input VOC to Plant 3, Line 3 (EU13, EU14 and EU15) shall be limited less than 25.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from Plant 3, Line 3 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Plant 3, Line 3 and any dry filters.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Plant 3, Line 3 is in operation.

D.4.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks, S/V13, S/V14, and S/V15, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements [326 IAC 2-7-6]

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.4.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address: PO Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: 079-7572-00010
Facility: Plant 3/Line 3 (EU13, EU14, EU15)
Parameter: VOC
Limit: Less than 25.0 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Paula M. Miano, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 516-691-3395 or in Indiana at 1-800-451-6027 (ext 516-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
PMM/MES
cc: File - Jennings County
U.S. EPA, Region V
Jennings County Health Department
Air Compliance Section Inspector - D.J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Erler Industries, Inc.
418 Stockwell Street
North Vernon, Indiana 47265

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T079-7572-00010	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: September 23, 1998

First Administrative Amendment 079-10586-00010 drafted May 6, 1999

Part 70 Significant Source Modification: 079-11008-00010	Pages Affected: 4, 5, 6, 19, 34a and 34b supercede 34, 40a Section Added: D.4, 34c and 34d
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Second Administrative Amendment 079-11173-00010	Pages Affected: 4, 5, 6, 19, 34a and 34b supercede 34, 40a Section Added: D.4, 34c and 34d
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary operation which spray paints plastic and metal parts.

Responsible Official:	J. Mark Erler
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address:	PO Box 219, North Vernon, Indiana 47265
SIC Code:	3479, 3663
County Location:	Jennings
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts consists of the following emission units and pollution control devices:

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

(1) One (1) paint line, identified as Line 1, with three (3) manual paint booths, identified as EU1, EU2, and EU3 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V1, S/V2 and S/V3.

(2) One (1) paint line, identified as Line 2, with two (2) manual paint booths, identified as EU4 and EU5 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V4 and S/V5.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

Located in Plant 2 (71 Hayden Pike, North Vernon, Indiana 47265):

(1) One (1) paint line, identified as Line A, with three (3) manual paint booths, identified as EU6, EU7 and EU8, respectively, with a maximum of two (2) HVLP guns per booth, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V6, S/V7, and S/V8.

(2) One (1) paint line, identified as Line B, with four (4) paint booths (each booth using HVLP guns, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V9, S/V10, S/V11, and S/V12): two (2) manual booths, identified as EU9 and EU10, and two (2) robot paint booths, identified as EU11 and EU12.

Line A and Line B each have a maximum capacity of 4.0 gallons/hour of conductive copper paint, a maximum capacity of 2.5 gallons/hour of conductive silver paint and a maximum capacity of 2.0 gallons/hour with conductive black paint.

Located in Plant 3 (125 West Hayden Pike, North Vernon, Indiana 47625)

(1) One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts that also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A, and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 mmBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

(b) Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

(c) Two (2) natural gas fired ovens located in Plant 3, identified as Oven-1 and Oven-2, exhausting to S/V3-1 and S/V3-2 respectively, rated at 1.2 mmBtu/hr, each.

(d) One (1) air make-up unit, located in Plant 3, identified as AM-1, rated at 6.0 mmBtu/hr.

(e) Two (2) infra-red (IR) ovens, located in Plant 3, identified as Oven-IR3 and Oven-IR4.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary operation which spray paints plastic and metal parts is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOC's is limited to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

SECTION D.3 FACILITY OPERATION CONDITIONS
INSIGNIFICANT ACTIVITIES

Facility Description [326 IAC 2-7-5(15)]

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 mmBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

(b) Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

(c) Two (2) natural gas fired ovens located in Plant 3, identified as Oven-1 and Oven-2, exhausting to S/V3-1 and S/V3-2 respectively, rated at 1.2 mmBtu/hr, each.

(d) One (1) air make-up unit, located in Plant 3, identified as AM-1, rated at 6.0 mmBtu/hr.

(e) Two (2) infra-red (IR) ovens, located in Plant 3, identified as Oven-IR3 and Oven-IR4.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the two (2) 100,000 Btu/hr natural gas fired ovens, identified as 6A and 7A, and the two (2) IR ovens, identified as 9A and 10A, located in Plant 1, and those facilities listed in Condition D.1.4, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The PM from the two (2) 1.0 mmBtu/hr ovens, identified as 8B and 9B, located in Plant 2, and those facilities listed in Condition D.2.3, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The PM from the two (2) 1.2 mmBtu/hr ovens, identified as Oven-1 and Oven-2, located in Plant 3, and those facilities listed in Condition D.4.2, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Plant 3, Line 3

Located in Plant 3

One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

The input VOC to Plant 3, Line 3 (EU13, EU14 and EU15) shall be limited to less than 25.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from Plant 3, Line 3 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the dry filters on Plant 3, Line 3.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Plant 3, Line 3 is in operation.

D.4.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, S/V13, S/V14,and S/V15, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements [326 IAC 2-7-6]

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.4.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address: PO Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: 079-7572-00010
Facility: Plant 3/Line 3 (EU13, EU14, EU15)
Parameter: VOC
Limit: Less than 25.0 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____